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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GRIFFEN SECURITY, LLC,

Plaintiff,

Case No. 1:19-cv-03494 VSB

- VS -

BOBBIE THOMPSON, MARKEITH BOYD,
SHIRLEY LORRAINE BOYD and CITADEL
CAR ALARMS, LLC.,

Defendants.
-----X

**MOTION FOR ENLARGEMENT IN TIME TO RESPOND
TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

We, Bobbie Thompson, Markeith, Shirley Lorraine Boyd and Citadel Car Alarms, LLC, declare under penalty of perjury that:

1. We are the named defendants listed in the aforementioned caption of this legal action, that Markeith Boyd is the President of Citadel Car Alarms, LLC, and that Bobbie Thompson resides in New York, New York, while Markeith Boyd and Shirley Lorraine Boyd resides in Fitchburg, WI, and that Citadel Car Alarms, LLC is also headquartered in Fitchburg, WI.
2. That we were recently served with this Summons and Complaint and that we are not attorneys, nor trained in the science of jurisprudence.
3. We are respectfully asking for an enlargement of time and request a period of 30 additional days in which to identify, select and secure counsel to represent us in this matter.
4. We have already made an effort in good faith and pursuant to the Fed. R. Civ. P. to first seek an enlargement of time with counsel for the Plaintiff, by Markeith Boyd placing several


telephone calls to (212) 751-4300 and (646) 218-7633, the office of Jacqueline I. Meyer, Attorney for the Plaintiff.

5. Markeith Boyd could not reach a live party and therefore left his name and contact information on the voicemail messages left.
6. On or around Tuesday, May 14, 2019, at approximately 3:14 p.m., Markeith Boyd received a telephone call from (571) 267-7002, a Shauna Wertheim.
7. Shauna Wertheim identified herself as Counsel for Plaintiffs and agreed to a ten (10) enlargement of time in which to secure representation.
8. We have made every effort to identify and secure counsel since being served, however, our efforts have thus far proven fruitless.
9. This is the very first and only request for such an enlargement..
10. We are asking for a 30 day enlargement of time in which to secure seasoned counsel to represent us due to logistics and the physical locations of the parties.
11. Further, we request that this Honorable Court grant such other and further relief as this Court may deem just and equitable.

Dated: New York, New York
Fitchburg, Wisconsin
May 14, 2019



By: Bobbie Thompson



Markeith Boyd



Shirley Lorraine Boyd



Citadel Car Alarms, LLC